

STATE OF KANSAS



DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field

Topeka, Kansas 66620-0001

Phone (913) 296-1500

Mike Hayden, *Governor*

Stanley C. Grant, Ph.D., *Secretary*

Gary K. Hulett, Ph.D., *Under Secretary*

December 18, 1987

Mr. Larry Prouty
Olin Water Servies - Olin Corporation
P.O. Box 10918
Overland Park, Kansas 66210

RECEIVED

DEC 17 1987

PRMT SECTION

Re: Olin Water Services - Olin Corporation
Kansas City, Kansas
EPA I.D. Number KSD000203639

Dear Mr. Prouty:

The Kansas Department of Health and Environment (KDHE) has made the tentative decision to modify the Resource Conservation and Recovery Act (RCRA) permit issued to Olin Water Services - Olin Corporation in Kansas City, Kansas. Enclosed for your information is a copy of the administrative record which includes the public notice for newspaper, public notice of radio broadcast, modified draft permit, and fact sheet.

On December 18, 1987, a 45-day public comment period on your draft modified permit begins. You are invited to submit written comments during this period, if you wish. On this date, the public notice will be published in the Kansas City Kansan and broadcast over radio stations KFKF (FM) and KCKM (AM). Comments on the proposed permit must be submitted in writing before February 1, 1988 to Mr. John Goetz, Hazardous Waste Section, KDHE, Topeka, Kansas.

A public hearing has not been scheduled; however, if requests are received which indicate a significant degree of public interest in this draft permit, a public hearing will be scheduled. Requests for a public hearing must be received by January 19, 1988.

The KDHE Secretary will make a final decision to modify the permit after consideration of all comments received and of the requirements of all state and federal hazardous waste regulations, statutes, and policies.




R00011187

RCRA Records Center

Mr. Larry Prouty
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December 18, 1987

We appreciate your cooperation in providing information during the permit review process. Should you have any questions concerning these procedures, please contact me at (913) 296-1611 or Mr. John Goetz at (913) 296-1607.

Sincerely,


Janel J. Rogers
Environmental Engineer
Hazardous Waste Section
Bureau of Waste Management

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C Wes Bartley
James Fischer

STATE OF KANSAS



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PRMT SECTION

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November 23, 1987

Ms. Karen Flournoy
RCRA Permit Section
Waste Management Division
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: Proposed Permit Modifications
Olin Water Services
Kansas City, Kansas
EPA I.D. Number KSD000203633

Dear Ms. Flournoy:

Olin Water Services, Kansas City, Kansas, has requested major modifications to their RCRA hazardous waste storage permit. The revised pages submitted by Olin for the Part B application are enclosed. The changes are as follows:

1. Section 270.14(b)(1). General description of the facility. - This page has been revised to reflect a linear height limitation versus the number of stacked drums in the present permit.
 2. Section 270.15(a). Description of containment system. - This page has also been corrected regarding stacking height limitation to make it consistent with 270.14(b)(1).
 3. Section 270.14(b)(5). General inspection schedule. - The inspection frequency of the condition of containers has been changed to weekly, the inspection frequency of the amount of aisle space between containers has been changed to weekly, and the inspection frequency of the condition of emergency equipment has been changed to monthly.
- ✓

Ms. Karen Flourney
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4. Section 270.14(b)(5). Inspection log. - The inspection frequency of the emergency equipment log has been change to monthly. The column for aisle space from the containment system inspection log has been placed on the inspection log for containers. The inspection frequency for the containers log has been changed to weekly.

We propose to following the procedures contained in 40 CFR 270.41 for modification of both the existing state and EPA permits for this facility. The modifications are being provided for your 15-day period of review and comment as specified in the EPA-Kansas Transition Plan for RCRA Implementation Under Final Authorization. If we do not receive any comment from your office within fifteen days, we will consider the modifications approved and will proceed to place them on public notice.

Sincerely,



Janel J. Rogers
Environmental Engineer
Hazardous Waste Section
Bureau of Waste Management

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Enclosures
C James Fischer

(revised 11/87)

270.14(b)(1): A general description of the facility.

The facility is a hazardous waste drum storage area in a detached building in the production yard of the Olin Water Services Plant. The floor of the building is a reinforced concrete slab surrounded on three sides by concrete block walls and covered by a steel roof with clear panels for lighting. The north side of the building is open and has a six foot wide ramp along the entire length which rises nine inches to the building floor. The building floor is sloped away from the entrance ramp to a sump along the back wall. The drums will be stored on four foot pallets in four rows five pallets deep with aisles on either side of the rows and stacked at a height not to exceed twelve (12) feet. Ignitable and reactive wastes will be stored in the outside rows. Aqueous wastes will be stored in the two middle rows. The total number of drums stored in the facility will not exceed 200-55 gallon drums. A design drawing of the facility is included in Section 270.15(a)(1).

(revised 11/87)

270.15(a) : A description of the containment system to demonstrate compliance with Section 264.175. Show at least the following:

- (1) Basic design parameters, dimensions, and materials of construction. See accompanying design drawing. The facility will be constructed to comply with local building codes. A construction schedule is attached.

The proposed storage facility is designed to physically and structurally hold an area four pallets wide by five pallets deep (pallets are four feet by four feet). The pallets may be stacked to a height not to exceed twelve (12) feet. The total number of drums stored in the facility will not exceed 200-55 gallon drums.

The overall dimensions of the facility will be about 31 by 26 feet and the area available for storage will be about 25 by 24 feet.

The slab and sump will be constructed of concrete reinforced with carbon steel wire mesh. The sump cover will be a carbon steel grate. The access ramp will be asphalt.

270.14(b)(5): A copy of the general inspection schedule required by Section 164.15(b)....

GENERAL INSPECTION SCHEDULE

- I. Procedures and Responsibilities
 - A. General inspection frequency: weekly
 - B. Individuals authorized to conduct inspection in order of alternate service:
 - 1. Production supervisor.
 - 2. Plant manager.
 - C. Inspectors to record observations and date/nature of repairs or other remedial actions on "WASTE AREA INSPECTION LOG" (see attachment).
- II. Items to be inspected and frequency of inspections
 - A. Condition of containers: weekly
 - 1. Leaks.
 - 2. Deterioration.
 - 3. Stability of stacking arrangements and condition of pallets.
 - B. Containment System: daily
 - 1. General condition of containment curbs, floor and sump.
 - 2. Condition of sump pump.
 - C. Amount of aisle space between containers: weekly
 - D. Condition of emergency equipment: monthly
 - 1. Fire hoses and fire extinguishers.
 - 2. Siren alarms.
 - 3. Emergency showers and eye wash stations.
 - 4. Scott Air Packs.
 - 5. Liquid vacuum equipment.
- III. Items inspected by outside contractors/suppliers and frequency of inspections
 - A. Fire hoses and fire extinguishers: yearly
 - B. Sprinkler system: yearly

Attachment: "WASTE AREA INSPECTION LOG" format

EMERGENCY EQUIPMENT

INSPECTION FREQUENCY :

MONTHLY

[illegible]

CONTAINMENT SYSTEM

INSPECTION FREQUENCY : DAILY.

[illegible]

INSPECTION FREQUENCY

WEEKLY

[illegible]